

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

In Re:	:
	: Chapter 13
Natalya Zhuiko	: Case No. 20-13912-MDC
	:
Debtor,	:
-----	:
Wilmington Savings Fund Society, FSB, as	:
Trustee for Upland Mortgage Loan Trust A	:
	:
Movant,	:
v.	: Hearing: February 2, 2021 at 10:30 a.m.
	: Courtroom # 2
Natalya Zhuiko	:
	:
Debtor,	:
and	:
	:
William C. Miller, Esquire	: 11 U.S.C. §362(d) and §1301
Trustee,	:
and	:
	:
Oleg Zhuiko	:
Party-in-Interest	:
	:
Respondents.	:
	:

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Wilmington Savings Fund Society, FSB, as Trustee for Upland Mortgage Loan Trust A has filed a motion for relief from automatic stay under §362(d) and §1301 co-debtor stay with the court to permit Movant to pursue its rights in the property described below to the extent and in the manner provided by any applicable contract documents and non-bankruptcy law.

350 Laurel Oaks Drive, Langhorne, PA 19047

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

1) If you do not want the Court to grant Movant relief from the automatic stay and co-debtor stay regarding the above property, or if you want the court to consider your views on the motion, then on or before, **January 21, 2021**, you or your attorney must do all of the following:

a) File with the Court a written response to Movant's motion explaining your position. Your response must be filed with the Bankruptcy Clerk, at the United States Bankruptcy Court:

United States Bankruptcy Court
Eastern District of Pennsylvania
Bankruptcy Clerk of Courts
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your response to the Court for filing, you must mail it early enough so the Court will **receive it** on or before the date stated above:

b) You must also mail a copy to:

Brian E. Caine, Esquire
PARKER, McCAY, P.A.
9000 Midlantic Drive, Ste 300
P.O. Box 5054
Mt. Laurel, NJ 08054
Attorney for Movant

William C. Miller, Esq.
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105
Chapter 13 Trustee

2) If you or your attorney do not take the steps described in Paragraph 1(a) and Paragraph 1(b) and attend the hearing, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief requested in the motion.

3) A hearing on the motion is scheduled to be held before the Honorable Chief Judge Magdeline D. Coleman, on February 2, 2021 at 10:30 a.m. in United States

Bankruptcy Court, Eastern District of Pennsylvania, Robert N.C. Nix, Sr. Federal
Courthouse, 900 Market Street, Suite 400, Courtroom #2, Philadelphia, PA 19107.

4) If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5) You may contact the Bankruptcy Clerk's Office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: January 7, 2021

By: /s/ Brian E. Caine
BRIAN E. CAINE, ESQ.
ATTORNEY FOR MOVANT
PA ID# 86057
Parker, McCay, P.A.
9000 Midlantic Drive, Ste 300
P.O. Box 5054
Mt. Laurel, NJ 08054
(856) 985-4059
bcaine@parkermccay.com